



U.S. Department of Justice

950 Pennsylvania Avenue NW
Washington, D.C. 20530

May 29, 2024

VIA CM/ECF

Hon. Dale E. Ho
U.S. District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho,

We write respectfully on behalf of the Government to request the Court's leave to file documents under temporary seal, pursuant to paragraph 9 of the Protective Order, ECF No. 83, and Rule 6(d) of Your Honor's Individual Rules. The documents comprise the Government's Hague Convention Memorandum of Law and attachments, which disclose the names and addresses of foreign witnesses from which the Government seeks to take testimony under the Hague Convention. In meet-and-confer practice today, the parties provisionally agreed that publicly disclosing these witnesses' names and addresses could adversely affect their employment and business prospects, given the code of privacy and discretion endemic to the yachting industry. The Government will provide these witnesses with a copy of the Protective Order, which affords an opportunity for the parties and third parties to file a letter explaining the need to maintain documents under seal. The Government will apprise the Court no later than June 12, 2024 if longer than the 14 days permitted under the Protective Order is needed to complete this process.

Respectfully Submitted,

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By: /s/ Jennifer Jude
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cc: Claimants' counsel (by ECF)